

Application Type Renewal  
Facility Type Storm Water  
Major / Minor Minor

**NPDES PERMIT FACT SHEET  
INDIVIDUAL INDUSTRIAL WASTE (IW)  
AND IW STORMWATER**

Application No. PAS802214  
APS ID 922140  
Authorization ID 1390260

**Applicant and Facility Information**

Applicant Name	<u>North American Bulk Transportation Inc.</u>	Facility Name	<u>North American Bulk Transportation</u>
Applicant Address	<u>611 S 28th Street PO Box 754 Milwaukee, WI 53215-1201</u>	Facility Address	<u>3190 Daniels Road Nazareth, PA 18064-9054</u>
Applicant Contact	<u>Larry Nilmeier</u>	Facility Contact	<u>Chuck Gostony</u>
Applicant Phone	<u>(470) 330-9545</u>	Facility Phone	<u>(610) 759-9783</u>
Client ID	<u>179562</u>	Site ID	<u>585276</u>
SIC Code	<u>4213</u>	Municipality	<u>Upper Nazareth Township</u>
SIC Description	<u>Trans. &amp; Utilities - Trucking, Except Local</u>	County	<u>Northampton</u>
Date Application Received	<u>March 28, 2022</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>May 31, 2022</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>.Renewal of NPDES permit to discharge stormwater from truck terminal parking lot</u>		

**Summary of Review**

The applicant is requesting a renewal of their NPDES permit to discharge stormwater associated with an industrial activity to an unnamed tributary to East Branch of Monocacy Creek, a high quality, cold water fishery, migratory fishery designated receiving stream located in State Water Plan watershed 2-C. As per the Department's current existing use list, the receiving stream does not have an existing use classification that is more protective than the designated use. The discharge is not expected to affect public water supplies.

This facility is classified under SIC code 4213 (Trucking Terminal Facility), which requires the applicant to monitor according to Appendix L of the latest General Stormwater Permit. The parameters which they must monitor are Total Suspended Solids (TSS) and Oil and Grease. The benchmark values are not effluent limitations, and exceedances do not constitute permit violations. However, if the permittee's sampling demonstrates exceedances of benchmark values for two consecutive monitoring periods, the permittee shall submit a corrective action plan within 90 days of the end of the monitoring period triggering the plan.

The Stormwater Part C requirements include Best Management Practices (BMPs), Routine Inspections, Preparedness, Prevention, and Contingency Plan, and Stormwater Monitoring Requirements. Appendix L also contains Sector Specific BMPs that must be implemented by the permittee if coverage under this permit is approved.

Upon running an open violations by client query on WMS, four unresolved violations were found. This included failure to submit NPDES renewal application on time, failure to submit monitoring reports, failure to collect representative samples, and failure to submit a corrective action plan. The corrective action plan is required by part C. VI. F. of the current individual stormwater permit to reduce the concentrations of the parameters in stormwater discharges for having two consecutive benchmark violations for the same parameter at the same outfalls. In this instance, TSS benchmark limits were exceeded during consecutive monitoring periods at both Outfalls 001 and 002 during the 7/1-12/31/2019 and 1/1-6/30/2020 monitoring periods. A list of violations can be found in the table below.

Approve	Deny	Signatures	Date
X		Rory Sgarlat (signed) Rory Sgarlat, E.I.T. / Environmental Engineering Specialist	August 3, 2022
X		Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Environmental Engineer Manager	8-15-22

Summary of Review

PERMIT	PF KIND	FEE CATEGORY	VIOL ID	VIOLATION DATE	VIOLATION TYPE	VIOLATION TYPE DESC	VIOLATION COMMENT
PAS8022 14	Stormwater -Industrial	IW Stormwater Individual Permit	947962	03/18/2022	92A.75(A)	NPDES - Failure to submit NPDES renewal application at least 180 days prior to expiration or later approved date	Permit renewal application not received 180 days prior to Permit expiration. Permit renewal application was due no later than 10/2/2021 as required by NPDES Permit. As of 3/18/2022 no Permit renewal application received by Department from permittee.
PAS8022 14	Stormwater -Industrial	IW Stormwater Individual Permit	947963	03/18/2022	92A.41(A)10 C	NPDES - Failure to collect representative samples	Samples were not collected as required by Permit during the monitoring periods 1/1-6/30/2019 and 7/1-12/31/2020 at Outfall 002 nor during the monitoring period 7/1-12/31/2020 at Outfall 001.
PAS8022 14	Stormwater -Industrial	IW Stormwater Individual Permit	947964	03/18/2022	92A.41(A)12 B	NPDES - Failure to submit monitoring report(s) or properly complete monitoring reports	Late DMR for 1/1-6/30/2021 period. Incorrect reporting of concentration values on 7/1-12/31/2021 DMR. Failure to submit Annual Reports for calendar years 2017 and 2019.
PAS8022 14	Stormwater -Industrial	IW Stormwater Individual Permit	947965	03/18/2022	92A.46	NPDES - Violation of Part C permit condition(s)	Failure to submit Corrective Action Plan to the Department as required by Part C.VI.F. following benchmark violations during two consecutive monitoring periods. TSS benchmark limits were exceeded during consecutive monitoring periods at both Outfalls 001 and 002 during the 7/1-12/31/2019 and 1/1-6/30/2020 monitoring periods.

The initial application package was submitted on March 28, 2022, and the permit expired on March 31, 2022. On May 31, 2022, the required General Information Form and Act 14 notification letter were submitted.

Public Participation

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

**Compliance History**

**DMR Data for Outfall 001 (from May 1, 2021 to April 30, 2022)**

Parameter	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21
TSS (mg/L) Daily Maximum					< 3260						< 4.0	
Oil and Grease (mg/L) Daily Maximum					< 5.6						< 5.5	

**DMR Data for Outfall 002 (from May 1, 2021 to April 30, 2022)**

Parameter	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21
TSS (mg/L) Daily Maximum					< 868						36.0	
Oil and Grease (mg/L) Daily Maximum					< 5.0						< 5.0	